

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

HATEM SALEM,

Defendant.

Case No. 1:25-cr-105 (CMH)

CONSENT MOTION TO EXTEND TIME FOR INDICTMENT

The United States of America, by and through its attorneys, Erik S. Siebert, United States Attorney for the Eastern District of Virginia, and Lauren E. Hahn, Special Assistant United States Attorney, with the express consent of the defendant, and the defendant's counsel, respectfully move the Court to extend the time to indict this case through and including May 2, 2025. In support thereof, the parties state as follows:

1. The defendant was arrested on January 30, 2025 for a violation of Title 21, United States Code, Sections 841(a)(1) and 846 (conspiracy to distribute 50 grams or more of methamphetamine). On January 30, 2025, the defendant made his initial appearance in the District of Connecticut. On February 3, 2025, the defendant's motion for release on bond was heard in the District of Connecticut and was denied. The defendant was subsequently transferred to the Eastern District of Virginia. On February 13, 2025, attorney Cadence Mertz of the Federal Public Defender's Office was appointed to represent the defendant. On February 19, 2025, the defendant made his initial appearance in the Eastern District of Virginia and a preliminary hearing was set for February 27, 2025.

2. On February 28, 2025, the Honorable Leonie M. Brinkema, United States District Judge for the Eastern District of Virginia, granted the government's first Consent Motion to

Extend Time for Indictment in this case until and through April 11, 2025. On April 4, 2025, the Honorable Leonie M. Brinkema, United States District Judge for the Eastern District of Virginia, granted the government's second Consent Motion to Extend Time for Indictment in this case until and through April 25, 2025. The parties have resolved the case and a preindictment plea hearing has been set before this Court for April 25, 2025. The government is requesting an extension of time to indict through May 2, 2025, in the event a plea is not in fact entered on April 25th. Counsel for the defendant has been consulted and is in agreement with this motion.

3. The Speedy Trial Act requires that the defendant be indicted within thirty days of the defendant's arrest after subtracting all excludable time. The parties jointly request an extension of approximately 30 days for an extension of the time to indict. Extending this time period for approximately 30 days would be in the best interests of justice in that it would give defense counsel an opportunity to meet with the defendant, to review discovery and to discuss a possible pre-indictment plea resolution of the case.

4. The defendant hereby agrees to waive any objections under the Speedy Trial Act and to extend the government's time to file an indictment in this case through and including May 2, 2025. The waiver is made knowingly, intentionally, and voluntarily by the defendant, and with full knowledge of the provisions of the Speedy Trial Act, Title 18, United States Code, Sections 3161, *et seq.*, and with the advice and consent of counsel.

5. The defendant expressly understands that his waiver is not predicated upon any promises, agreements, or understandings of any kind between the government and the defense in this case, and that nothing contained herein shall be construed to preclude the government from proceeding against the defendant during or after the time period covered by this waiver.

WHEREFORE, the parties request that the time to indict this case be extended to and including May 2, 2025 and that the delay resulting from this extension be excluded in computing the time within which an indictment must be filed pursuant to Title 18, United States Code, Section 3161(h).

Respectfully submitted,

Erik S. Siebert
United States Attorney

Date: April 15, 2025

By: /s/
Lauren E. Hahn
Special Assistant United States Attorney (LT)